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JAN 15 2010

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
AT 8:30
WILLIAM T. WALSH, CLERK

CHASAN LEYNER & LAMPARELLO, PC
300 Harmon Meadow Boulevard
Secaucus, New Jersey 07094-3621
201-348-6000

Attorneys for Defendants, City of Garfield, City of Garfield Police Department and
Chief Kevin Amos
Our File No. 13258-0010

T.S., A Minor, by her parent and Natural
Guardian, T.G., and T.G. individually,

Plaintiff,

vs.

**CITY OF GARFIELD, CITY OF GARFIELD
POLICE DEPARTMENT; CHIEF KEVIN
AMOS, OFFICER TODD MOSBY, JOHN
DOES 1-10 (UNKNOWN DEFENDANTS),**

Defendants.

Civil Action No.: 09-950 (DRD)

**DISCOVERY CONFIDENTIALITY
ORDER**

THIS MATTER coming before the court upon joint application of Leonard & Leonard, P.A., Scott G. Leonard, Esq. appearing, counsel for the plaintiff, and Chasan Leyner & Lamparello, Joseph A. Garcia appearing, counsel for the defendants, City of Garfield, City of Garfield Police Department, and Chief Kevin Amos, and the court having considered the matter and having found that good cause is present for the entry of this Discovery Confidentiality Order in that the plaintiff is at risk for emotional damage in the event that discovery of her mental health history is not afforded confidentiality,

IT IS on this 15th day of January 2010,

ORDERED that the defendants City of Garfield, City of Garfield Police Department and Chief Kevin Amos, are entitled to unrestricted discovery, subject to the terms of this order, of the mental health history of the plaintiff, known by her initials, T.S., including, but not by way of limitation, discovery of treatment records from all prior mental health care providers, pupil records from school officials and prescription medication records, for which the plaintiff will execute the appropriate authorizations; and it is further,

ORDERED that all documentation produced in compliance with this order shall be designated as confidential information and as such may be disclosed or made available only to the court, including courtroom personnel and jury impaneled in connection with this case, to the undersigned counsel for each party to this case, including the paralegal, clerical and secretarial staff employed by each counsel and those "qualified persons" deemed by counsel to aid in the prosecution, defense or settlement of this action including experts or consultants, together with clerical staff, claims representatives and their staff and any and all court reporters employed in this action; and, it is further,

ORDERED that if any confidential information subject to this order is used in a courtroom proceeding, the information shall not lose its status as confidential and the party using it shall take all reasonable steps to maintain its confidentiality; and, it is further.

ORDERED that should any document or information designated as confidential information be disclosed, through inadvertence or otherwise, to any person or party not

entitled to receive the same hereunder then the parties shall use their best efforts to bind such persons to the terms of this order; and it is further,

ORDERED that this order shall survive the final determination of this action and the court shall retain jurisdiction to resolve any dispute concerning the use of information disclosed pursuant to or in violation of this order.

A handwritten signature in black ink, appearing to read "M. Shipp", written in a cursive style.

HONORABLE MICHAEL A. SHIPP, U.S.M.J.

Consented as to entry and form:


CHASAN LEYNER & LAMPARELLO, PC
Attorneys for Defendants City of Garfield,
Garfield Police Department and Chief Kevin
Amos

By: 
JOSEPH A. GARCIA

Dated: 1/14/2010

LEONARD & LEONARD, PA
Attorneys for Plaintiffs

Dated:

By: 
SCOTT G. LEONARD